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DRAFT COMMENTS

PROJECT NO. 52373

REVIEW OF WHOLESALE ELECTRIC	§	PUBLIC UTILITY COMMISSION
	§	
MARKET DESIGN	§	OF TEXAS

THE ADVANCED POWER ALLIANCE AND AMERICAN CLEAN POWER ASSOCIATION COMMENTS REGARDING WHOLESALE MARKET DESIGN PROPOSALS

The Advanced Power Alliance and the American Clean Power Association submit the following response to the request for stakeholders to submit market design proposals to the Public Utility Commission of Texas (Commission) in Project 52373: *Review of Wholesale Market Design*. An executive summary is included as the final page of this filing. The comments submitted do not reflect the opinions of any individual member company.

I. Introduction

The Advanced Power Alliance (APA) and the American Clean Power Association (ACP) appreciate this opportunity to provide proposals to the Commission regarding market design changes to support improved reliability in light of the Winter Storm Uri outages and other concerns voiced by Commissioners. Our proposals draw heavily from other commenters and are rooted in fundamental principles shared by many in the Electric Reliability Council of Texas (“ERCOT”) region.

Specifically, we believe that any changes to the ERCOT market structure must leverage the power of free-market competition whenever possible, and that changes should be approached from a technology neutral perspective based on identified, quantified, and validated system needs. The diversity of the ERCOT marketplace is an asset that should be leveraged,

not diminished or undermined. The Commission's inquiry into market design is well-timed to develop the near and long term market structures that will ensure continued investments in a diverse portfolio that will ensure system cost-effective system reliability. The proposals here from APA and ACP focus on near-term solutions (i.e., those solutions that can conceivably be implemented within the next year) and longer-term solutions that require further discussion and analysis by the Commission and stakeholders.

It is important to identify and define the system needs in order to effectively evaluate proposals for market design changes. Based on stakeholder feedback and Commissioner comments, we believe that the needs can be grouped into four primary categories:

- (1.) Preventing the massive correlated system failures seen in Winter Storm Uri;
- (2.) Addressing concerns about a growing need for flexible, dispatchable resources;
- (3.) Ensuring investment in expanded reserves for general unexpected outages; and
- (4.) Ensuring an investment climate sufficient to incentivize continued capacity expansion necessary to serve and balance the continued load growth in ERCOT.

The problems highlighted by Winter Storm Uri are largely attributable to a combination of insufficient weatherization across generation technologies and in particular substantial issues throughout the natural gas supply chain, as highlighted in the September 28th Senate Business & Commerce Committee hearing.¹

The central role of natural gas supply chain issues in causing the outages during winter storm Uri is well established. The recent report from the North American Electric Reliability Corporation ("NERC") and the Federal Electric Regulatory Commission ("FERC"), with input from the Texas Reliability Entity ("TRE"), found that 55% of the capacity outages during winter

¹ <https://www.texastribune.org/2021/09/28/texas-power-grid-loop-hole/>

storm Uri were from natural gas, and that in total at least 75% of the outages were from thermal units.² While some market design changes can support the overall effort to prevent another sustained outage across the state, ultimately the weatherization standards being considered in Project No. 51840 and the Railroad Commission of Texas in its proposed new 16 Texas Administrative Code (“TAC”) §3.64 and proposed amendments to 16 TAC §3.107 should be the most effective lever to prevent the devastating impacts experienced during Uri. These weatherization standards will be undermined, however, if the Railroad Commission fails to take concrete actions that complement the work of the Public Utility Commission, including ensuring that natural gas supply is able to flow to power plants without interruption.

By contrast, the concerns around resources to manage future ramping needs, expanded reserves to support unplanned outages, and meeting load growth in ERCOT are eminently addressable through a combination of market-based solutions. Our comments, therefore, focus primarily on these needs and will highlight where and how market design changes will also benefit the effort to avoid severe outages during increasingly devastating extreme weather events. While market design changes can support efforts to weatherize the power and fuel supply systems, they are no substitute for sufficient weatherization of the power and fuel supply systems against winter, summer, and other unexpected weather extremes.

II. Near-Term Market Design Solutions

APA and ACP Support Changes to the ORDC

The APA and ACP agree with the many stakeholders who have supported changes to the Operating Reserve Demand Curve (ORDC). In its initial development, the ORDC was designed specifically to address pricing during scarcity conditions. However that design should not be set in stone. The Commission should consider the ORDC as a flexible tool to address

² <https://www.ferc.gov/media/february-2021-cold-weather-grid-operations-preliminary-findings-and-recommendations-full>

pricing deficiencies in the market, and we support Commissioner McAdams' recent direction³ to open a new proceeding specific to this issue. The ORDC was developed in response to a combination of extreme weather events in 2011 and low forecasted reserve margins looking forward from its implementation in 2014. As a result, it was crafted to address the lack of price signals during scarcity conditions to ensure resource adequacy during the hottest days of the year. That original design should not constrain the ORDC's use as an effective market-based tool to attract and retain flexible, dispatchable resources. In addition to its flexibility as a tool, as noted by Commissioner McAdams, changes to the ORDC can be implemented quickly, possibly soon enough to impact the winter of 2022, and can also be adjusted incrementally.

We agree with commenters including South Texas Electric Cooperative ("STEC")⁴, Hunt Energy Network,⁵ Exelon,⁶ and Shell,⁷ that some combination of increases to the minimum contingency level ("X"), increases to the standard deviation in the Loss of Load Probability ("LOLP") calculation, reductions in the Value of Lost Load ("VOLL"), and changes to the shape of the curve will likely create a more stable investment environment and lower risk. While some commenters argue that changes would not induce investment in new resources, these assertions are impossible to validate without evaluating specific proposals to change the ORDC. Changes to the ORDC to emphasize the need for flexible, dispatchable resource will certainly aide in the retention of existing resources as well as the design of new resource to improve their dispatchability. This is particularly the case with new expected wind and solar resources that could be incentivized to add storage and grid-forming capabilities to leverage new ORDC revenue. The emergence of battery storage and the ability to couple wind and solar generation with complementary battery storage through the marketplace presents an incredible opportunity for ERCOT to tap its abundant wind and solar resources, which saved ERCOT customers \$5.7

³ <http://interchange.puc.texas.gov/search/documents/?controlNumber=52373&itemNumber=128>

⁴ Comments of STEC dated 8/16/2021, p. 2

⁵ Comments of HEN dated 8/16/2021, p. 2

⁶ Comments of Exelon dated 8/16/2021, p. 3

⁷ Comments of Shell Energy North America dated 8/16/2021, p.5

billion from 2010-2017,⁸ to deliver new dispatchable generation that will increase system reliability.

Fundamentally, we recognize the urgency of the situation, which can most directly be addressed through weatherization standards and improved weatherization for the natural gas supply chain. The Commission's decision to move quickly on the most urgent changes around weatherization allows for changes to the ORDC or other market design elements to be informed by much needed rigorous, independent analysis and sufficient stakeholder review. The APA and ACP recommend the Commission consider a minimum baseline figure for X that moves the ORDC away from being a tool that is only leveraged when a crisis is imminent and toward becoming a more effective tool to attract and retain investment in flexible, dispatchable resources. In addition, ERCOT's continued procurement of additional backup reserves should be accounted for in the calculation of X thereby increasing the threshold value by an amount equivalent to their increased procurement.

The Commission has expressed a need to refocus market design on two key priorities – supporting grid reliability and managing customer costs. The ORDC is well suited to balancing these two objectives by adjusting multiple variables to achieve the right balance of cost and increased reliability. In fact, due to its market-based underpinnings, changes to the ORDC are likely to be a least-cost, highly effective alternative to proposals that recommend dedicated programs with fixed cost structures. With the right design, the ORDC model can send an early market signal to developers, owners and operators to build additional resources that could respond to the ORDC market signals and deliver the additional capacity and energy to the market during times of system needs. As technologies continue to improve, the diversity of resources on the ERCOT grid will grow, reducing reliance on primarily thermal resources. A shift

⁸ "The Economic Value of Renewable Energy in Texas," p. 15

from the current mix with over 78% of supply demand being met by thermal resources⁹ to a grid with a combination of thermal and non-thermal resources can be leveraged to create a more cost-effective and reliable electric system. The flexible and nimble ORDC market mechanism is well-suited to leverage a more diverse resource mix including load, and inverter-based resources to support specific characteristics needed in the market.

The APA and ACP encourage the Commission to move quickly to analyze the impact to customers and to the market from a suite of possible changes to the ORDC. Specifically, the Commission should request analysis, from either ERCOT or a reputable third party, that reviews the impact of changes to X, the standard deviation of the LOLP, VOLL, and to the shape of the curve. This review will provide Commissioners and stakeholders with the opportunity to assess the ability of such changes to attract and retain dispatchable generation. In theory, we agree that the change can more year-to-year certainty for any generator that can deliver during ORDC hours, thereby reducing the risk from forecast errors or forced outages creating an unexpected need for additional resources occurs.

Avoid Unintended Consequences

Finally, APA and ACP agree with the broad range of comments that have been submitted in this proceeding highlighting the unintended consequences of requiring Day-Ahead Market (“DAM”) commitments in order to receive the Real-Time Reserve Price Adder. This type of mandate would be a significant step in the direction of establishing a capacity market, something the Commissioners and many members of the Texas Legislature have publicly rejected on a frequent basis. Requiring DAM participation or otherwise restricting access to ORDC revenue to a special class of ERCOT resources would effectively result in many resources across ERCOT having to pay as much as \$9000/MWh (of whatever new high

⁹ http://www.ercot.com/content/wcm/lists/197391/ERCOT_Fact_Sheet_11.10.20.pdf

system-wide offer cap the Commission may adopt) for the right to generate during conditions in which the ORDC is activated.

Many operating resources and most newly contracted resources in ERCOT are settled at the hub, i.e., the seller must buy at the hub to deliver to the buyer. If the seller must pay back the ORDC portion of busbar revenues to ERCOT and then buy at the hub (including ORDC) to settle with purchaser, the seller will be penalized for generating during emergency conditions. For busbar settled contracts, the buyer takes ownership at the point of interconnection, then generally sells it there and buys at their load settlement point. If that node price is \$8000/MWh less than what they have to pay to serve their load, that would be catastrophic. In either case, the most likely result is a cost to either the generator or the buyer of \$8,000/MWh or more, in which case the generator would be forced to not generate to avoid incurring overwhelming costs thereby reducing the reliability of the ERCOT grid.

Forcing generation out of the market during times when the ORDC is applied is surely not to the benefit of customers or overall grid reliability. APA and ACP agree with the comments made by a broad range of stakeholders including retail electric providers, generators, and other market experts¹⁰ who support retaining the current technology neutral approach to this vital market mechanism. APA and ACP also agree with the comments from stakeholders¹¹ that requirements for generation resources to commit in the DAM or otherwise commit capacity ahead of real-time more generally are not in keeping with Texas' energy-only market structure. Such approaches effectively create a capacity market, a policy solution considered, and dismissed, by the Texas Legislature. The ERCOT DAM is a voluntary market that creates liquidity and price discovery to support real time operations and resource planning and should remain voluntary for those wishing to engage in the market.

¹⁰ See, e.g., *Shell* at p. 4 "Limiting ORDC-eligible resources to those assets committed in the DAM would defeat the purpose of real time reserve price signals."

¹¹ E.g., *Vistra* at p. 4: "Other U.S. markets do have a must-offer requirement for generators, but only for those who have received payment for their capacity in a separate market."

II. Mid-Term Market Design Solutions

New Products and Markets Must Fill an Identified and Quantified Need

Several commenters, including LCRA, TIEC, and others have suggested new reliability, firming, or ramping products. Based on the memo to stakeholders¹² we expect some commenters will propose new recommendations for market design changes. We look forward to continuing to engage with the Commission and with stakeholders to refine new market design recommendations, and request that the Commission allow additional time for stakeholder feedback on any new recommendations. We propose a framework for evaluating new market design recommendations that extend beyond modifications of existing markets as follows:

- (1) Can this need or service be met by leveraging the real-time market or the day-ahead market? Solutions that leverage market signals, such as changes to the ORDC, are likely to be more efficient and effective at driving investments to retain and attract flexible, reliable resources.
- (2) Is the service that is being proposed achievable with existing capacity already in the ERCOT marketplace? If the combination of markets and incentives has driven sufficient resources to meet the need identified, any additional revenue provided by a new product may encourage rent-seeking behavior.
- (3) Has the need for the service been quantified and established as a present need? We recognize the need and value of planning ahead, however developing a product for an issue that the market is not likely to experience in the next 5 years may eliminate any value gained from advanced planning. Without sufficient opportunity for price discovery, investors will be unable to evaluate the values and shortcomings of a dormant product. As a result, such

¹² Memo - Work Session for October 14, 2021, filed 9/20/2021

a product is unlikely to drive the retention of existing resources, much less attract new resources.

This framework is intended to support the Commission in evaluating new market design proposals, whether they involve ancillary services, new markets, or other dedicated programs. The APA and ACP support the development of new products for needs that satisfy these threshold questions and maintain ERCOT's technology neutral approach. As we continue to transition to a lower carbon, cleaner, more flexible, and lower cost power grid, the Commission has before it an excellent opportunity to ensure that we move through the transition without disruption and in a manner that benefits all electric power consumers and the Texas economy.

In considering new products and programs, we urge the Commission to allow sufficient time for stakeholder feedback and collaboration to assess the impacts of all proposed solutions, including near-term and long-term solutions, to adequately evaluate and thoroughly review to avoid unintended consequences. With the right design, the ORDC model combined with weatherization requirements for resources and fuel suppliers, can send an early market signal to developers, owners and operators to build additional resources that can respond to the ORDC market signals and deliver the additional capacity and energy to the market during times of system needs. We recommend that any additional new products be developed on a timeline that allows the Commission to evaluate the initial impacts of any near term changes, along with stakeholder input during a second, longer-term part of the process to review reliability in ERCOT.

Our member companies support the development of new products if there is sufficient evidence that such proposals will meaningfully impact ERCOT's ability to attract and retain the energy resources needed for system reliability. We believe that improvements to system reliability do not need to come at the expense of our current competitive, transparent, technology neutral, free-market system. These critical attributes have supported investor

confidence in new generation resources, largely solar, wind, and energy storage, without which ERCOT would fall short of the Commission's planning reserve margin as soon as 2022. For example, ERCOT's latest Capacity, Demand, and Reserves Report finds that renewable energy accounts for over 90% of the new capacity needed to meet growing peak summer demand in 2022 and beyond.¹³ At the same time, significant amounts of gas-fired generation continue to be developed in the ERCOT region. The Commission and ERCOT should continue to support this development of a diverse portfolio of resources to cost-effectively and reliably meet the future needs of Texans.

Maintain Free Market Principles of Non-discriminatory Access

A central component of ERCOT's successful approach to market competition is the non-discriminatory allocation of costs necessary to maintain grid reliability to load. ERCOT allocates the cost of grid reliability primarily to load as load is the primary beneficiary. The balancing of supply and demand in ERCOT relies on a portfolio approach, one in which each resource has a different set of strengths and weaknesses. The size and operational characteristics of some thermal generation units makes it difficult for them to ramp up or down quickly in response to ERCOT signals.

Any unit – thermal or renewable - operating at their maximum output are able to reduce output based on ERCOT needs but would be unable to respond to ERCOT direction to increase dispatch. At the same time, inverter-based resources can respond to ERCOT signals more quickly and with greater accuracy than any thermal resource. Moreover, these diverse attributes must be balanced against the continuous changes of demand on the grid, which often create greater changes in net load than variations in renewable energy output. In balancing these different characteristics to maintain grid reliability, the Commission and ERCOT have historically

¹³ http://www.ercot.com/content/wcm/lists/219841/CapacityDemandandReservesReport_May2021.xlsx

taken a non-discriminatory approach, which recognizes that while each generator and load resource has unique characteristics, each resource contributes to system reliability.

APA and ACP strongly support this continued non-discriminatory approach. Changing the cost allocation approach for one set of technologies will create an unsustainable regulated bias, a ‘thumb on the scale,’ for specific resources – which may ultimately come at the cost of consumers, system reliability, or both. A discriminatory approach also conflicts with the clear language of Senate Bill 3, which in Subsection 35.004(h) states that the Commission shall require ERCOT to allocate costs “in a manner consistent with cost-causation principles and on a nondiscriminatory basis.”¹⁴ If the Commission desires to allocate ancillary services costs to a sub-segment of generation, in order to do so on a nondiscriminatory basis, it must also allocate costs to all generators, as well as to load. The complexity of beginning down the path of allocating ancillary services to generation resources and individual loads are substantial, and the risks to system reliability are very real in a competitive energy market. This complexity would be further increased by the fact that ERCOT makes after-the-fact adjustments to the amount it spends to procure ancillary services for one operating day in subsequent operating days.

The complex process of allocating costs to generation in a nondiscriminatory fashion would likely impose serious negative impacts for specific generation facilities reducing overall resource adequacy and thereby creating new risks to system reliability. As an example, the level ERCOT sets for responsive reserve service is based on a contingency of losing the two largest generating unit in ERCOT (N-2). Currently, those generators happen to be the two nuclear generation units at the South Texas Project Electric Generating Station (“STP”), in which case that generation resource would necessarily bear a meaningful amount of the costs associated with the most expensive product in order to maintain compliance with this federal operating

¹⁴ Texas State Utilities Code § 35.004(h)

requirement. APA and ACP join TEAM¹⁵ and other commenters¹⁶ in supporting a continuation of the free-market, nondiscriminatory practice of uplifting ancillary services costs to load.

III. Additional matters

Dispatchability of Different Generation Resources

Senate Bill 3 defines non-dispatchable resources as those generation resources “controlled primarily by forces outside of human control,” which can be interpreted in many ways. Given the focus of the bill on directing the Commission to resolve issues highlighted by Winter Storm Uri and prevent future multi-day blackouts, it is reasonable to assume that this definition is inclusive of the performance of technologies during extreme weather events. As highlighted during the storm, as well as past performance issues during extreme weather events, any generation technology can be non-dispatchable. Even during non-extreme weather, the operation of nuclear and some coal plants and gas units cannot be altered by human control within a timeframe that supports grid reliability. Furthermore, a thermal unit operating at its maximum output serves no purpose in being able to provide additional resources to the system rendering it non-dispatchable. An over-reliance on a narrow definition of ‘dispatchable’ risks emphasizing the need for performance during regular operations at the expense of performance during extreme conditions. As previously stated, the focus of market design changes should be that of providing adequate incentive to bring additional resources on-line that can respond to the market during times of system need.

¹⁵ See, e.g. TEAM at p. 3-4: “All reliability actions—from ERCOT’s procurement of additional ancillary services to the creation of any new, special ancillary services in response to SB3—should be socialized across the market, rather than borne unequally and without sufficient advance notice by individual market participants through load ratio share.”

¹⁶ TAEBA at p. 6, EDF at p. 7., TSPA at p. 4-5

We recognize the need for generation resources to be able to respond to ERCOT operational signals to maintain reliability. As noted in earlier comments,¹⁷ solar, and in fact most inverter-based resources, including wind and energy storage, can be dispatched more quickly and with greater accuracy than thermal generation. Inverter-based resources, particularly those installed in 2014 or later that typically employ inverters with grid-forming capabilities, can provide a variety of ancillary services, including fast frequency response, synthetic inertia, and voltage support.

Although renewable generation is not always fully dispatchable and does not have the rotating mass of traditional synchronous thermal generators, they can provide crucial ancillary services to the grid, including synthetic inertial response. Creating new market signals for the services needed will help support renewable energy technologies' implementation in additional projects and ease the burden on conventional generators. ERCOT has reported an increase in projected frequency changes due to generation loss, attributable to a decline of system inertial response from a higher proportion of renewable generators on the grid (without advanced inverters).¹⁸ Recognizing the value of the projects that do implement the technology by encouraging their participation and compensating them appropriately will be a valuable price signal.

In 2016 CAISO, First Solar, and the National Renewable Energy Laboratory (NREL) conducted a demonstration of a First Solar California photovoltaic (PV) project providing essential ancillary services, proving that PV can provide a wide range of grid services, including spinning reserves, load following, primary frequency control, ramp rate control, and voltage regulation (Loutan et al., 2017). Key to some of these services are advanced DC to AC inverters

¹⁷ Reference SEIA comments

¹⁸ Electricity Reliability Council of Texas. (2013). Future Ancillary Services in ERCOT; ERCOT: Taylor, TX, USA, 2013. Retrieved from http://www.ercot.com/content/news/presentations/2014/ERCOT_AS_Concept_Paper_Version_1.1_as_of_11-01-13_1445_black.pdf

that connect PV projects to the grid and can be programmed with virtual inertia algorithms to provide frequency stability similar to that of the rotating mass in a thermal generator (Tamrakar et al., 2017). In fact, the study found that inverter-based resources respond more quickly and more accurately to operator signals:

“The mean value of the [Automated Generator Control] control error during the whole period of testing for all three data sets is very low (-0.013% of the plant’s rated capacity), with standard deviation of error equal to 0.439%.”¹⁹

A response error less than .5% is remarkable and well within ERCOT’s typical operating requirements of 3.5% to as much as 10% error²⁰ for generators who receive a dispatch signal to provide Regulation and Fast Frequency Response Services.

As utilities and other load-serving entities (LSEs) procure renewable generation to meet rising demand, the Commission should guide LSEs to modernize their procurement focus to take full advantage of the ancillary services available from various forms of renewable energy. This is not an unprecedented practice; two utilities recently called specifically for submissions for dispatchable renewable resources (First Solar, 2019).²¹ In Texas, this could provide a unique opportunity to fully leverage clean power generators that are dispatchable, willing to under commit and provide a ramping service, and/or wind and solar installations with long-duration storage.

Allow the Market to Determine the Location of Resources, Including Energy Storage

¹⁹ <https://www.nrel.gov/docs/fy17osti/67799.pdf> p. 29

²⁰ See ERCOT Nodal Protocols 8.1.1.2.1.1(5), and 8.1.1.2.1.1(6)

²¹ First Solar. (2019). Evolving the Solar Procurement Paradigm: Procurement and Contracting Primer for Grid Flexible Solar. Retrieved from <http://go.firstsolar.com/I/474372/2019-10-28/g58hj>

During various discussions throughout this proceeding, some commentators have indicated support for the possibility or desirability of forcing renewable energy generators to install on-site energy storage. APA and ACP represent developers of both renewable energy and energy storage assets, and such requirements would unnecessarily limit the opportunities to develop energy storage in a way that most cost-effectively meets system needs. Co-locating energy storage with renewable energy assets makes sense in some circumstances, but those circumstances are properly dictated by market signals. The diversity of storage applications and locations is an advantage and storage should not be forced into a narrow corner of the market. Risks include having storage stuck behind new GTCs. During extreme events, it may be advantageous to have storage geographically dispersed throughout the system which can provide multiple hours of storage.

Continue to Accelerate Transmission Buildout to Unlock Existing Resources and their Attendant Low-Cost and System Reliability Attributes

In the medium term, power transmission buildout will also be critical for enhancing generation reliability. As the Commission has recently done for the Rio Grande Valley, it should accelerate solutions for removing West Texas transmission constraints. The enormous wind and solar resources of West Texas can then provide reliable generation to Texas' population centers. Expanded transmission will also allow complementary battery storage development in those regions to support both load growth and continued development of generation resources.

IV. Conclusion

The Advanced Power Alliance and the American Clean Power Association appreciate this opportunity to offer proposals to the Commission that address issues identified in the aftermath of Winter Storm Uri. The APA and ACP are committed to working with other stakeholders and identifying opportunities for developing joint comments as we have done in the past.

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V. Executive Summary

• Near-Term Market Design Solutions

- APA and ACP agree with commenters who support changes to the ORDC, including changes to the minimum contingency level, to the value of lost load, and to the overall shape of the curve.
- Changes to the ORDC to emphasize the need for flexible, dispatchable resource will aid in the retention of existing resources as well as the design of new resource to improve their dispatchability.
- Limiting ORDC revenue to certain types of generation, or only to generation participating in other markets such as the DAM, creates a perverse outcome where substantial costs are incurred to generate during hours when the ORDC is in effect. A generator with such restrictions may be forced to reduce their output or to pay almost \$9,000/MWh for the right to generate during these times.

• Mid-Term Market Design Solutions

- New products must fulfill an identified and quantified need, requiring additional time for Commission analysis and stakeholder feedback. APA and ACP recommend pursuing these new proposals on a mid-term timeline to allow sufficient review and feedback.
- The Commission must maintain free market principles of open access and nondiscriminatory cost allocation, as laid out in PURA 35.004(h).

• Other Matters

- Dispatchability of Different Generation Resources.
- Allow the Market to Determine Location of Resources, Including Energy Storage.
- Continue to Accelerate Transmission Buildout to Unlock Existing Resources in West Texas.